

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Kona L. Taylor	:	Chapter 13
	:	Case No.: 21-11281-MDC
Debtor(s)	:	

EXPEDITED MOTION FOR AUTHORITY TO SELL REAL PROPERTY

Debtor, Kona L. Taylor, by and through her undersigned counsel bring this Motion to Sell Real Property under Eastern District of Pennsylvania Local Rule 6004-1 and Section 363 of the United States Bankruptcy Code; and in support thereof aver the following:

1. Debtor commenced the instant Chapter 13 matter on May 4, 2021 by filing a Voluntary Petition.
2. The Chapter 13 Plan was confirmed on December 2, 2021.
3. The subject real property is located at 4451 Glenwood Drive, Perkiomenville, PA (hereinafter referred to as “the property”) and is owned by the Debtor.
4. The Debtor believes it to be in her best financial interest to sell the property.
5. In furtherance of the sale, Debtor retained the services of Anthony Billetta of Keller Williams Blue Bell.
6. On or about July 8, 2022, Debtor, by and through her realtor entered into an Agreement of Sale of the property in the amount of \$273,200,000. A true and correct copy of the Agreement of Sale is attached hereto and labeled as **Exhibit “A.”**
7. The settlement date for the sale of the subject property is scheduled for August 5, 2022 and therefore an emergency hearing is required.

8. The Buyers, Ryan Klosinski and Colton Hagar, are not insiders of the Debtor and the sale represents an arms-length transaction between the parties made without fraud and/or collusion.

9. From the sale proceeds the Debtor intend to satisfy the mortgage(s) held by Pennsylvania Housing Finance Agency, along with any other liens on the property.

10. Debtor is desirous of receiving her full exemption in the sum of up to \$25,150.00 plus any remaining proceeds after all liens and the entire Chapter 13 Balance is satisfied.

WHEREFORE, Debtor respectfully requests that the Court enter an Order: (i) Granting this Motion, (ii) Authorizing the debtor to sell the Property to the proposed buyer under the terms of that Agreement for the Sale of Real Estate free and clear of liens, claims interests and encumbrances, and, (iii) Granting the debtor such other and further relief to which they may be justly entitled.

Dated: July 11, 2022

/s/Brad J. Sadek, Esq
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